

**BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

In re:	)	
	)	MDL No. 1816
Katz Interactive Call Processing Patent Litigation	)	
	)	
	)	

**NOTICE OF MOTION FOR TRANSFER AND CONSOLIDATION OF KATZ  
TECHNOLOGY LICENSING PATENT LITIGATION PURSUANT TO 28 U.S.C. § 1407**

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GLOBAL CROSSING TELECOMMUNICATIONS, INC.

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Global Crossing Telecommunications, Inc. (“Global Crossing”), a named defendant in *Ronald A. Katz Technology Licensing, L.P. v. Genesys Conferencing, Inc. et al.*, pursuant to 28 U.S.C. § 1407 and Rule 7.2 of the Rules of Procedure of the Judicial Panel Multidistrict Litigation (the “Panel”), Global Crossing moves the Panel for an Order: (1) transferring two related patent infringement actions (the “Teleconferencing Actions”) filed by Ronald A. Katz Technology Licensing, L.P. (“RAKTL”), as well as any other related patent infringement actions filed by RAKTL that the Panel may deem necessary, asserting similar or related claims against other defendants, to a single district court, and (2) consolidating those Teleconferencing Actions for coordinated pre-trial proceedings. Global Crossing requests that the Panel consolidate and transfer the litigation to the United States District Court for the District of Delaware (the “D. Del.”) for the purposes of judicial economy, or alternatively to the United States District Court for the Central District of California (the “C.D. Cal.”).

The Clerk of the Panel will determine the date, place and time of the hearing and service appropriate notice of same. This Motion is supported by this Notice, the Motion itself, Supporting Memorandum of Law, Schedule of the actions, and accompanying declaration and exhibits filed concurrently herewith, and any other evidence and argument presented in support of this motion.

Dated: November 6, 2006

By: \_\_\_\_\_

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